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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

11 MAY 1994

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MAY 11 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Phil Gramm
United States Senator
2323 Bryan Street, #1500
Dallas, TX 75201

Dear Senator Gramm:

This is in reply to your letter of April 19, 1994, on behalf of your constituent, Mike Pedigo, Executive Director of the Denco Area 911 District, who is interested in the implementation of Enhanced 911 (E-911) technology in the Personal Communication Services industry.

On September 23, 1993, the Commission adopted a Second Report and Order in GEN Docket No. 90-314 that established rules for new Personal Communications Services (PCS). In this Order, we urged the PCS industry and standards-setting bodies to "direct particular attention [to] offering an emergency 911 capability that would work with enhanced-911 systems (E-911) and, to the extent feasible, permit locating a caller in situations where the caller is unable to state his location." Also, we indicated that we were contemplating the initiation of a future rule making proceeding "to address E-911 and related issues with regard to PCS, cellular, and any other relevant mobile service."

In response to our Order, the Texas Attorney General's Office filed a Petition for Reconsideration requesting that we require PCS licensees to provide E-911 service as a condition of license, and that we require development of a single, uniform standard for PCS E-911 service. There were a number of comments filed in support of Texas' petition. Several companies expressed concern about the potentially significant added costs of providing precise E-911 location information, as well as the delays that an FCC mandate for providing such information could bring to PCS development.

We are carefully considering the Texas petition and the comments filed in response to it. Because of the importance of this issue, we are considering the initiation of a separate rule making proceeding later this year dedicated exclusively to the E-911 capabilities of mobile telephone services. Such a proceeding would allow us to fully address all regulatory aspects of E-911, and to develop the most fair and effective regulations possible. In the meantime, a joint industry group consisting of representatives from the Association of Public-Safety Communications Officials (APCO), the National Emergency Number Association (NENA), and the Personal Communications Industry Association (PCIA), have been working to develop a common position on how PCS E-911 service should be implemented. We expect the results of those discussions to be filed with the Commission shortly.

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Copy

The Honorable Phil Gramm

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We appreciate your constituent's thoughts on this important topic and have added them, along with your letter, to the record in the PCS proceeding.

Sincerely,



Thomas P. Stanley
Chief Engineer

Richard B. Engelman
Chief, OET/AED/TSB

Julius P. Knapp
Chief, OET/AED

cc (w/incoming): Secretary, for inclusion in GEN Docket 90-314

cc: Chief Engineer
Julius Knapp
Richard Engelman
Robert Bromery
Art Wall
DWilson:kls:May 5, 1994

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Phil Gramm
Texas

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United States Senate
OBT
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1902

Date: 4-19 MEMORANDUM

Federal Communications Commission
Office of Congressional Affairs
1919 "M" Street, NW
Washington, D.C. 20554

A constituent has sent the enclosed communication. A response which addresses his/her concerns would be appreciated.

Please send your response, together with the constituent's correspondence, to the following address:

Office of Senator Phil Gramm
2323 Bryan Street, #1500
Dallas, Texas 75201

Attention: Trish Robinson

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DENCO AREA 9 - 1 - 1 DISTRICT

250 S. Stemmons, Suite 260, Lewisville, Texas 75067
Phone/TDD (214) 221-0911 FAX (214) 420-0709

April 15, 1994

The Honorable Phil Gramm
United States Senator
2323 Bryan, Ste. 1500
Dallas, Texas 75201

Dear Senator Gramm:

On behalf of the citizens in Denton County, served by the Denco Area 9-1-1 District, I request your assistance in helping preserve the integrity of Enhanced 911 (E-911) systems in the District and across the United States.

The Denco Area 9-1-1 District was created in 1987 for the purpose of establishing 9-1-1 as the primary emergency telephone number in Denton County, Texas. Since the system became operational in August, 1990, the district has worked toward its mission to "... maintain 9-1-1 as the primary emergency telephone number for the Denco Area 9-1-1 District and enhance the ability of local governments to respond to calls for emergency help."

Recently the Federal Communications Commission (FCC) issued FCC General Docket # 90-314, dealing with Personal Communication Service (PCS). PCS is a new technology that will allow persons to utilize wireless telephone technology and be reached at one phone number at any location. The telephone system will have the capability to reach a 9-1-1 answering point, but will not provide the essential information to the call taker provided in today's enhanced 9-1-1 systems. The information provided today is the callers location, phone number and the nearest emergency responder. Not having this information would be a major step backward in emergency services. FCC Docket # 90-314 suggests that E-911 service be provided by the PCS industry, but does not require E-911 as part of initial service.

I realize that it is not government's place to mandate to the private sector how to develop its products and what features should be available. However, in this case the standard of emergency service has been greatly improved through the implementation of E-911 systems. Any technology that would not provide, at least the same level of service, should be discouraged, if not regulated. At the very least such devices should have warning labels attached informing the user that E-911 is not available with this device.

E-911 System
April 15, 1994
Page 2

I request that you investigate the ramifications of not requiring the PCS industry to implement measures that will provide location information when calling 9-1-1. I also request that you encourage the FCC to take a stronger position supporting E-911 service with PCS.

I have enclosed copies of sample correspondence to Chairman Reed Hundt of the FCC, addressing this issue.

Thank you for your assistance.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mike Pedigo", written in a cursive style.

Mike Pedigo
Executive Director

Enclosure

MLP/vjf

Congress of the United States
House of Representatives
Washington, DC 20515

February 10, 1994

The Honorable Reed Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W.
Room 814
Washington, DC 20554

Dear Chairman Hundt,

We are writing to urge the Federal Communications Commission to press to consider Enhanced 911 (E-911) services for new telecommunication technologies.


As you may know, the E-911 service allows emergency services responders to automatically identify a caller's location. This feature has been extremely helpful in saving lives in emergency situations. It has also helped in screening prank calls that cause valuable life saving resources to be unnecessarily deployed.

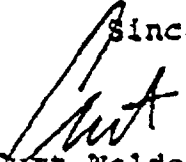
FCC General Docket # 90-314 suggests that E-911 service should be provided by the Personal Communication Service (PCS) industry, but does not require E-911 service be part of initial PCS service. It is our understanding that E-911 service was not required for PCS service because this issue would be addressed as part of a thorough overview by the FCC of E-911 requirements imposed on all wireless communication providers, including PCS, cellular and other mobile service providers.

We strongly urge you to move forward in a timely manner on this issue. Any delay in implementing the E-911 system into PCS may pose a public safety hazard that is unnecessary. Further, as the Commission recognized, attempts at implementation after the technology has fully matured will prove more difficult.

We would appreciate your views on this issue. We look forward to working with you on this most important issue.

Sincerely,


Rick Boucher
Member of Congress


Curt Weldon
Member of Congress


Steny Hoyer
Member of Congress

Sample letter to FCC
PCS/cellular access to E911

Reed Hundt
Chairman
Federal Communications Commission
Washington, D.C. 20554

Re: GN Docket 90-314, Personal Communications Service (PCS)

Dear Mr. Chairman:

The Commission's Second Report and Order in the referenced proceeding last October adopted regulations for the new mobile radiotelephone service called PCS, and it appears that you may grant the first licenses late this year or early in 1995. But an important piece of lifesaving business remains unfinished: Identifying and locating 911 callers who use mobile phones.

The Commission's October order recognized the problem, at ¶139:

The industry and standards-setting bodies should direct particular attention [to] offering an emergency 911 capability that would work with enhanced 911 systems (E-911) and, to the extent feasible, permit locating a caller in situations where that caller is unable to state his location. We are particularly concerned that unless an E-911 capability is designed into PCS systems, dialing 911 from a PCS telephone will not be equivalent to dialing 911 from a traditional wired telephone. (emphasis added)

The Commission said it could not require E-911 capability for PCS now, but would soon open another proceeding to look at the problem.

The Texas emergency communications agency, supported by 11 other states and by the National Emergency Number Association (NENA) has asked the Commission to reconsider its October decision not to require E-911 for PCS immediately. These states and NENA have asked you to adopt the requirement in the rules, or to make it a condition of PCS license, while leaving the industry and standards-setting bodies to come up with the precise technical methods.